

EXHIBIT 19

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 22 *Sharp Electronics Manufacturing Company of America, Inc.*

23 **UNITED STATES DISTRICT COURT**
 24 **NORTHERN DISTRICT OF CALIFORNIA**
 25 **SAN FRANCISCO DIVISION**

26 IN RE: CATHODE RAY TUBE (CRT)
 27 ANTITRUST LITIGATION

Case No.: 3:07-cv-5944-SC
 MDL NO.: 1917

28 This Document Relates To:

Sharp Electronics Corp., et al. v. Koninklijke Philips
Electronics N.V., et al.

INDIVIDUAL CASE: 3:13-cv-02776-SC

**RESPONSE TO KONINKLIJKE
 PHILIPS N.V.'S FIRST SET OF
 INTERROGATORIES TO SHARP
 ELECTRONICS CORPORATION
 AND SHARP ELECTRONICS
 MANUFACTURING COMPANY OF
 AMERICA, INC.**

PROPOUNDING PARTY: Defendant Koninklijke Philips N.V.

RESPONDING PARTIES: Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.

SET NO: One

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Rule 33.1 of the Local Rules of the Northern District of California, Plaintiff Sharp Electronics Corporation (“SEC”) and Sharp Electronics Manufacturing Company of America, Inc. (“SEMA”) (collectively, “Sharp”) hereby respond to Defendant Koninklijke Philips N.V.’s (“KPNV”) First Set of Interrogatories, dated July 21, 2014 (the “Interrogatories”) as follows:

GENERAL OBJECTIONS

The following general objections (“General Objections”) are incorporated in Sharp’s responses (“Responses”) to each and every interrogatory contained in the Interrogatories. No Response to any interrogatory shall be deemed a waiver of Sharp’s General Objections.

1. Sharp objects to the Interrogatories and the instructions therein to the extent that they seek to impose obligations on Sharp beyond those imposed by the Federal Rules of Civil Procedure, the Local Civil Rules of the Northern District of California, or any applicable order of the Court.
2. Sharp objects to the Interrogatories on the grounds that they are improperly being used as a discovery device, are oppressive, unduly burdensome and violate the rule of proportionality embodied in Federal Rule of Civil Procedure 26(b)(2)(C).
3. Sharp objects to the Interrogatories to the extent that they seek or call for information that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants from public sources.
4. Sharp objects to the Interrogatories to the extent that they seek or call for information that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants from others.
5. Sharp objects to the Interrogatories to the extent that they seek information that is neither relevant to this litigation, nor reasonably calculated to lead to the discovery of admissible evidence. Further, these Responses and Objections are without prejudice to, and not a waiver of,

1 Sharp's right to contend at trial or otherwise in this action that such information is irrelevant,
2 immaterial, inadmissible, or not a proper basis for discovery, nor any objection by Sharp to any
3 future use of such information.

4 6. Sharp objects to the Interrogatories to the extent that they are unintelligible, vague,
5 ambiguous, overly broad, unduly burdensome, and oppressive.

6 7. Sharp objects to the Interrogatories to the extent that they seek or call for information not
7 in Sharp's possession, custody, or control.

8 8. Documents produced by Sharp in this litigation shall be deemed produced in response to
9 these Interrogatories, subject to the Responses and Objections contained herein. The burden of
10 identifying specific information or documents responsive to these Interrogatories from documents
11 produced in the course of this litigation is substantially the same for either party, and Sharp is
12 entitled to elect the option to produce business records pursuant to Rule 33(d) of the Federal
13 Rules of Civil Procedure.

14 9. Sharp objects to the Interrogatories to the extent that they seek or call for information or
15 documents protected from disclosure by the attorney-client privilege, the attorney work product
16 doctrine, or any other privilege, protection, or immunity applicable under the governing law. Any
17 information disclosed pursuant to the Interrogatories will be disclosed without waiving, but on the
18 contrary reserving and intending to reserve, each of these privileges, protections, or immunities.
19 Any accidental disclosure of privileged information or material shall not be deemed a waiver of
20 the applicable privilege, protection, or immunity.

21 10. Sharp objects to the Interrogatories to the extent that they are duplicative and/or
22 cumulative, either internally of themselves or of discovery previously propounded to Sharp by
23 other defendants in this matter. Each such Interrogatory violates Section XV, subsections D and
24 E, of the Court's "Order Re Discovery and Case Management Protocol," entered on April 3,
25 2012. Order Re: Discovery and Case Management Protocol, *In re Cathode Ray Tube Antitrust*
26 *Litigation*, Case No. 07-cv-05944-SC, MDL No. 1917 (N.D. Cal. Apr. 3, 2012) (MDL Dkt. No.
27 1128).

1 11. Sharp objects to the Interrogatories to the extent they violate orders of the Court or the
2 Special Master in this case, including the Special Master's Report and Recommendation on the
3 Defendants' Motion to Compel, dated August 18, 2014.

4 12. Sharp objects to the Interrogatories, including the instructions and definitions, on the
5 grounds that Sharp will incur substantial expense in complying with them.

6 13. Sharp objects to the Interrogatories to the extent that they prematurely call for expert
7 testimony and states that Sharp will provide expert disclosures as provided by the Federal Rules
8 of Civil Procedure and the orders of the Court.

9 14. Sharp objects to the Interrogatories to the extent that they call for speculation or call for a
10 conclusion on an issue of law.

11 15. Sharp objects to the Interrogatories to the extent they seek information about contentions
12 or call for all evidence or all information in support of allegations or contentions. Such
13 Interrogatories are premature; Sharp has not completed its discovery and preparation in this
14 matter, and its investigation of this case is ongoing. These responses are being made after
15 reasonable inquiry into the relevant facts, and are based only upon the information and
16 documentation that is presently known to Sharp. Further investigation and discovery may result
17 in the identification of additional information or contentions, and Sharp reserves the right to
18 supplement and modify its responses. Sharp's responses should not be construed to prejudice its
19 right to conduct further investigation in this case, or to limit Sharp's use of any additional
20 evidence that may be developed.

21 16. Sharp objects to, and expressly disclaims, any need or intent to prove any facts listed
22 herein as a prerequisite to proving its claims at trial.

23 17. Sharp reserves its right to try its case as it determines is best at trial. This includes by not
24 using facts or information stated herein or using facts or information in addition to those stated
25 herein.

26 18. Sharp's responses will be subject to the Stipulated Protective Order entered in this action
27 (MDL Dkt. No. 306).

19. Sharp objects to the Interrogatories to the extent they contain any incidental or implied admission of fact or law. Sharp's responses to all or any part of any Interrogatory should not be taken as an incidental or implied admission, agreement, or concurrence that: (i) Sharp accepts or admits an express or implied assumption of fact set forth in or assumed by the Interrogatory; (ii) Sharp accepts or admits any express or implied assumption of law set forth in or assumed by the Interrogatory; (iii) Sharp has in its possession, custody or control documents or information responsive to that Interrogatory; or (iv) documents or information responsive to that Interrogatory exist.

20. Sharp objects to the Interrogatories to the extent that they call for speculation or call for a conclusion on an issue of law.

21. Sharp reserves its right to object to and/or challenge any evidence on grounds of competency, relevance, materiality, privilege, or admissibility at trial or at any hearing or proceeding with respect to any admissions sought by the Interrogatories and all answers Plaintiffs provide in response to these Interrogatories.

22. Sharp objects to the extent the Interrogatories misrepresent Sharp's allegations and the opinions expressed by Sharp's expert(s) in this case.

23. Sharp objects to the Interrogatories to the extent that they are compound and/or contain discrete subparts in violation of Federal Rule of Civil Procedure 33(a)(1).

24. Sharp objects to the definition of "All" because the construction of "All" to include "all, each, any, and every" is vague, ambiguous, and confusing, and likely to create multiple, contradictory meanings from the same language. Sharp further objects to the definition of "All" as not reasonably limited in scope or time. Sharp uses "all" according to its ordinary meaning.

25. Sharp objects to Definition No. 2 because the construction of "'and' and 'or'" is vague, ambiguous, and confusing, and likely to create multiple, contradictory meanings from the same language. Sharp uses "and" and "or" according to their ordinary meanings.

26. Sharp objects to the definition of "DOCUMENT(S)" as vague, ambiguous, and unreasonably broad and, depending upon Defendants' meaning, may call for a legal conclusion. Sharp also objects to the definition of "DOCUMENTS" to the extent that it calls for documents

1 that are subject to the attorney-client privilege, the work product doctrine, other applicable
2 privilege, or are not in Sharp's possession, custody or control.

3 27. Sharp objects to the definition of "IDENTIFY" because it is overly broad, unduly
4 burdensome, and oppressive insofar as it requires that Sharp identify and locate numerous
5 individuals involved in thousands of discrete purchases made over the course of more than 12
6 years, dating back to 1995. Sharp also objects to the definition of "IDENTIFY" with respect to
7 identifying persons and identifying events or occurrences to the extent that it calls for information
8 beyond Sharp's possession, custody or control. Moreover, virtually all of the individuals
9 responsive to these requests are current or former employees of the KPNV Defendants or their co-
10 conspirators, and that information is therefore fully known to KPNV or is otherwise discoverable
11 by less burdensome methods.

12 28. Sharp objects to the definition of "YOU" and "YOUR" as overbroad, vague, and not
13 reasonably calculated to lead to the discovery of admissible evidence. In responding to the
14 Interrogatories directed to "YOU" or "YOUR," Sharp will respond for the Plaintiffs SEC and
15 SEMA and persons acting on their behalf.

16 29. Sharp objects to Definition No. 14 because it is vague, ambiguous, and confusing and
17 likely to create multiple, contradictory meanings from the same language. Sharp refers to
18 singular and plural nouns according to their ordinary meanings.

19 30. Sharp objects to Definition No. 15 because it is vague, ambiguous, and confusing and
20 likely to create multiple, contradictory meanings from the same language. Sharp uses the present
21 and past tenses according to their ordinary meanings.

22 31. Sharp objects to Instruction No. 1 to the extent that it calls for information that is the
23 subject of the attorney-client privilege, the work product doctrine, or any other applicable
24 privilege, or is not in Plaintiffs' possession, custody or control.

- Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set of Interrogatories (July 10, 2014); and
- Philips Electronics North America Corporation's Responses to Direct Action Plaintiffs' First Set of Interrogatories (July 10, 2014).

Request No. 6:

Describe in detail and in narrative form (including by Identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for your allegation that Royal Philips was an active participant in the alleged conspiracy, as alleged in paragraph 194 of the Complaint.

Response to Request No. 6:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendant, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory improperly requires Sharp to marshal all evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case, and is therefore in violation of the Special Master's Order Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3, 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to a specific Philips entity when all of the Philips entities named as defendants were owned and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at

1 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699
2 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.
3 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly
4 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance
5 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request
6 calls for expert testimony. Sharp also objects to the extent that this request calls for information
7 that is covered by attorney-client privilege or the work product protection. Sharp further states
8 that it has not completed its discovery and preparation in this matter and that its investigation of
9 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this
10 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

11 Subject to and without waiving the foregoing objections, Sharp states that the response to
12 this Interrogatory may include the transactional data and documents produced by defendants, co-
13 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
14 responsive to this Interrogatory from review of the documents and data identified in this response
15 is substantially the same for either Sharp or KPNV. Sharp further states that information
16 responsive to this Interrogatory is contained in the following, which are incorporated here by
17 reference:

- 18 • Exhibit A to these Responses;
- 19 • Attachment A to these Responses;
- 20 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
21 materials;
- 22 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
23 materials;
- 24 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
25 accompanying materials;
- 26 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 27 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 28 • The European Commission Report on the CRT Conspiracy;

- 1 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
- 2 Set of Interrogatories, No. 5 (February 10, 2012);
- 3 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 4 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 5 2013);
- 6 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 7 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 8 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 9 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 10 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 11 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 12 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 13 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 14 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 15 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 16 of Interrogatories (July 10, 2014);
- 17 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 18 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 19 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 20 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 21 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 22 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 23 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 24 Interrogatories (November 2, 2011);
- 25 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 26 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 27 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 28 Interrogatories (December 23, 2011);

- 1 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 2 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 3 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 4 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 5 • Philips Electronics North America Corporation's Responses to Direct Action
- 6 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 7 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 8 Interrogatories (May 12, 2010);
- 9 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 10 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 11 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 12 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 13 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 14 (November 25, 2013);
- 15 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 16 Admission (November 25, 2013);
- 17 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 18 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 19 Interrogatories (February 10, 2012);
- 20 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 21 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 22 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 23 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 24 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 25 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 26 those Responses (July 28, 2014);
- 27 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 28 Interrogatories to Sharp (August 4, 2014);

- 1 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 2 2014);
- 3 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 4 Interrogatories to Sharp (August 4, 2014);
- 5 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 6 4, 2014); and
- 7 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 8 (August 4, 2014).

9 **Request No. 7:**

10 Describe in detail and in narrative form (including by Identifying each Document, Person
11 or other evidentiary source that You rely upon) the factual basis for your allegation that Royal
12 Philips participated in the alleged conspiracy through PEIL, as alleged in paragraph 194 of the
Complaint.

13 **Response to Request No. 7:**

14 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
15 also objects to this Interrogatory to the extent that it calls for information that is already in the
16 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,
17 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this
18 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
19 Sharp to state its entire case on an incomplete record and review and analyze all information
20 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory
21 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,
22 in responses to written discovery, but particularly while discovery is ongoing and in advance of
23 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further
24 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly
25 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other
26 discovery propounded in this case, and is therefore in violation of the Special Master's Order
27 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,
28 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular

1 action to a specific Philips entity when all of the Philips entities named as defendants were owned
2 and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also
3 objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal
4 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at
5 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699
6 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.
7 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly
8 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance
9 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request
10 calls for expert testimony. Sharp also objects to the extent that this request calls for information
11 that is covered by attorney-client privilege or the work product protection. Sharp further states
12 that it has not completed its discovery and preparation in this matter and that its investigation of
13 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this
14 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

15 Subject to and without waiving the foregoing objections, Sharp states that the response to
16 this Interrogatory may include the transactional data and documents produced by defendants, co-
17 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
18 responsive to this Interrogatory from review of the documents and data identified in this response
19 is substantially the same for either Sharp or KPNV. Sharp further states that information
20 responsive to this Interrogatory is contained in the following, which are incorporated here by
21 reference:

- 22 • Exhibit A to these Responses;
- 23 • Attachment A to these Responses;
- 24 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
25 materials;
- 26 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
27 materials;

- 1 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
- 2 accompanying materials;
- 3 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 4 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 5 • The European Commission Report on the CRT Conspiracy;
- 6 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
- 7 Set of Interrogatories, No. 5 (February 10, 2012);
- 8 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 9 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 10 2013);
- 11 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 12 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 13 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 14 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 15 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 16 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 17 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 18 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 19 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 20 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 21 of Interrogatories (July 10, 2014);
- 22 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 23 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 24 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 25 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 26 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 27 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 28

1 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
2 Interrogatories (November 2, 2011);

- 3 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
4 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
5 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
6 Interrogatories (December 23, 2011);
- 7 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
8 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 9 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
10 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 11 • Philips Electronics North America Corporation's Responses to Direct Action
12 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 13 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
14 Interrogatories (May 12, 2010);
- 15 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
16 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 17 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
18 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 19 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
20 (November 25, 2013);
- 21 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
22 Admission (November 25, 2013);
- 23 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
24 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
25 Interrogatories (February 10, 2012);
- 26 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
27 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
28

- 1 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 2 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 3 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 4 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 5 those Responses (July 28, 2014);
- 6 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 7 Interrogatories to Sharp (August 4, 2014);
- 8 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 9 2014);
- 10 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 11 Interrogatories to Sharp (August 4, 2014);
- 12 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 13 4, 2014); and,
- 14 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 15 (August 4, 2014).

Request No. 8:

17 Describe in detail and in narrative form (including by Identifying each Document, Person
18 or other evidentiary source that You rely upon) the factual basis for your allegation that Philips
19 America participated in the alleged conspiracy through Royal Philips and PEIL, as alleged in
paragraph 194 of the Complaint.

Response to Request No. 8:

20 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
21 also objects to this Interrogatory to the extent that it calls for information that is already in the
22 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,
23 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this
24 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
25 Sharp to state its entire case on an incomplete record and review and analyze all information
26 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory
27 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,
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1 in responses to written discovery, but particularly while discovery is ongoing and in advance of
2 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further
3 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly
4 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other
5 discovery propounded in this case, and is therefore in violation of the Special Master's Order
6 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,
7 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular
8 action to a specific Philips entity when all of the Philips entities named as defendants were owned
9 and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also
10 objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal
11 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at
12 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699
13 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.
14 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly
15 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance
16 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request
17 calls for expert testimony. Sharp also objects to the extent that this request calls for information
18 that is covered by attorney-client privilege or the work product protection. Sharp further states
19 that it has not completed its discovery and preparation in this matter and that its investigation of
20 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this
21 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

22 Subject to and without waiving the foregoing objections, Sharp states that the response to
23 this Interrogatory may include the transactional data and documents produced by defendants, co-
24 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
25 responsive to this Interrogatory from review of the documents and data identified in this response
26 is substantially the same for either Sharp or KPNV. Sharp further states that information
27 responsive to this Interrogatory is contained in the following, which are incorporated here by
28 reference:

- 1 • Exhibit A to these Responses;
- 2 • Attachment A to these Responses;
- 3 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
- 4 materials;
- 5 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
- 6 materials;
- 7 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
- 8 accompanying materials;
- 9 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 10 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 11 • The European Commission Report on the CRT Conspiracy;
- 12 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
- 13 Set of Interrogatories, No. 5 (February 10, 2012);
- 14 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 15 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 16 2013);
- 17 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 18 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 19 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 20 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 21 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 22 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 23 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 24 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 25 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 26 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 27 of Interrogatories (July 10, 2014);
- 28

- 1 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 2 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 3 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 4 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 5 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 6 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 7 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 8 Interrogatories (November 2, 2011);
- 9 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 10 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 11 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 12 Interrogatories (December 23, 2011);
- 13 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 14 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 15 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 16 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 17 • Philips Electronics North America Corporation's Responses to Direct Action
- 18 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 19 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 20 Interrogatories (May 12, 2010);
- 21 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 22 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 23 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 24 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 25 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 26 (November 25, 2013);
- 27 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 28 Admission (November 25, 2013);

- Toshiba America Electronic Components, Inc.'s Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- Sharp's Responses to Thomson SA and Thomson Consumer's First Set of Interrogatories, Nos. 2 & 8 (July 10, 2014);
- Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to those Responses (July 28, 2014);
- Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014); and
- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014).

Request No. 9:

Describe in detail and in narrative form (including by Identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for your allegation that Royal Philips participated in the alleged conspiracy through LP Displays (f/k/a LGPD), as alleged in paragraph 194 of the Complaint.

Response to Request No. 9:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendant, or that can equally or more readily, conveniently,

1 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this
2 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
3 Sharp to state its entire case on an incomplete record and review and analyze all information
4 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory
5 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,
6 in responses to written discovery, but particularly while discovery is ongoing and in advance of
7 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further
8 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly
9 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other
10 discovery propounded in this case, and is therefore in violation of the Special Master's Order
11 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,
12 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular
13 action to a specific Philips entity when all of the Philips entities named as defendants were owned
14 and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also
15 objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal
16 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at
17 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699
18 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.
19 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly
20 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance
21 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request
22 calls for expert testimony. Sharp also objects to the extent that this request calls for information
23 that is covered by attorney-client privilege or the work product protection. Sharp further states
24 that it has not completed its discovery and preparation in this matter and that its investigation of
25 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this
26 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

27 Subject to and without waiving the foregoing objections, Sharp states that the response to
28 this Interrogatory may include the transactional data and documents produced by defendants, co-

1 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
2 responsive to this Interrogatory from review of the documents and data identified in this response
3 is substantially the same for either Sharp or KPNV. Sharp further states that information
4 responsive to this Interrogatory is contained in the following, which are incorporated here by
5 reference:

- 6 • Exhibit A to these Responses;
- 7 • Attachment A to these Responses;
- 8 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
9 materials;
- 10 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
11 materials;
- 12 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
13 accompanying materials;
- 14 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 15 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 16 • The European Commission Report on the CRT Conspiracy;
- 17 • Deposition of Roger de Moor (July 31-August 1, 2012);
- 18 • Deposition of Pil Jae Lee (July 16-17, 2013);
- 19 • Deposition of Jim Smith (December 12-13, 2013);
- 20 • Deposition of Wiebo Vaartjes (December 18-19, 2013);
- 21 • Deposition of Patrick Canavan (January 30-31, 2014);
- 22 • Deposition of Robert O'Brien (March 20-21, 2014);
- 23 • Deposition of Joseph Killen (May 15, 2014);
- 24 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
25 Set of Interrogatories, No. 5 (February 10, 2012);
- 26 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
27 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
28 2013);

- 1 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 2 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 3 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 4 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 5 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 6 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 7 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 8 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 9 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 10 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 11 of Interrogatories (July 10, 2014);
- 12 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 13 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 14 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 15 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 16 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 17 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 18 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 19 Interrogatories (November 2, 2011);
- 20 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 21 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 22 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 23 Interrogatories (December 23, 2011);
- 24 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 25 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 26 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 27 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 28

- 1 • Philips Electronics North America Corporation's Responses to Direct Action
2 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 3 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
4 Interrogatories (May 12, 2010);
- 5 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
6 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 7 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
8 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 9 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
10 (November 25, 2013);
- 11 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
12 Admission (November 25, 2013);
- 13 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
14 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
15 Interrogatories (February 10, 2012);
- 16 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
17 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 18 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
19 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 20 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
21 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
22 those Responses (July 28, 2014);
- 23 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
24 Interrogatories to Sharp (August 4, 2014);
- 25 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
26 2014);
- 27 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
28 Interrogatories to Sharp (August 4, 2014);

- 1 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 2 4, 2014); and
- 3 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 4 (August 4, 2014).

5 **Request No. 10:**

6 Describe in detail and in narrative form (including by Identifying each Document, Person

7 or other evidentiary source that You rely upon) the factual basis for your allegation that Philips

8 America participated in the alleged conspiracy through LP Displays (f/k/a LGPD), as alleged in

 paragraph 194 of the Complaint.

9 **Response to Request No. 10:**

10 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp

11 also objects to this Interrogatory to the extent that it calls for information that is already in the

12 possession, custody, or control of Defendant, or that can equally or more readily, conveniently,

13 and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this

14 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on

15 Sharp to state its entire case on an incomplete record and review and analyze all information

16 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory

17 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,

18 in responses to written discovery, but particularly while discovery is ongoing and in advance of

19 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further

20 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly

21 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other

22 discovery propounded in this case, and is therefore in violation of the Special Master's Order

23 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,

24 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular

25 action to a specific Philips entity when all of the Philips entities named as defendants were owned

26 and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also

27 objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal

28 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at

1 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699
2 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.
3 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly
4 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance
5 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request
6 calls for expert testimony. Sharp also objects to the extent that this request calls for information
7 that is covered by attorney-client privilege or the work product protection. Sharp further states
8 that it has not completed its discovery and preparation in this matter and that its investigation of
9 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this
10 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

11 Subject to and without waiving the foregoing objections, Sharp states that the response to
12 this Interrogatory may include the transactional data and documents produced by defendants, co-
13 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
14 responsive to this Interrogatory from review of the documents and data identified in this response
15 is substantially the same for either Sharp or KPNV. Sharp further states that information
16 responsive to this Interrogatory is contained in the following, which are incorporated here by
17 reference:

- 18 • Exhibit A to these Responses;
- 19 • Attachment A to these Responses;
- 20 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
21 materials;
- 22 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
23 materials;
- 24 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
25 accompanying materials;
- 26 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 27 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 28 • The European Commission Report on the CRT Conspiracy;

- Deposition of Roger de Moor (July 31 – August 1, 2012);
- Deposition of Pil Jae Lee (July 16-17, 2013);
- Deposition of Jim Smith (December 12-13, 2013);
- Deposition of Wiebo Vaartjes (December 18-19, 2013);
- Deposition of Patrick Canavan (January 30-31, 2014);
- Deposition of Robert O'Brien (March 20-21, 2014);
- Deposition of Joseph Killen (May 15, 2014);
- Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, No. 5 (February 10, 2012);
- Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12, 2013);
- Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- Koninklijke Philips Electronics N.V. and Philips Electronics North America Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (July 18, 2012);
- Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set of Interrogatories (July 10, 2014);
- LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatories Nos. 4 and 5;

- 1 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
2 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
3 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
4 Interrogatories (November 2, 2011);
- 5 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
6 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
7 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
8 Interrogatories (December 23, 2011);
- 9 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
10 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 11 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
12 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 13 • Philips Electronics North America Corporation's Responses to Direct Action
14 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 15 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
16 Interrogatories (May 12, 2010);
- 17 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
18 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 19 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
20 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 21 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
22 (November 25, 2013);
- 23 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
24 Admission (November 25, 2013);
- 25 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
26 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
27 Interrogatories (February 10, 2012);
- 28

- Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- Sharp's Responses to Thomson SA and Thomson Consumer's First Set of Interrogatories, Nos. 2 & 8 (July 10, 2014);
- Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to those Responses (July 28, 2014);
- Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of Interrogatories to Sharp (August 4, 2014);
- Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014); and
- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp (August 4, 2014).

Request No. 11:

Describe in detail and in narrative form (including by Identifying each Document, Person or other evidentiary source that You rely upon) the factual basis for your allegation that Philips America was an active, knowing participant in the alleged conspiracy, as alleged in paragraph 195 of the Complaint.

Response to Request No. 11:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendant, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information

1 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory
2 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,
3 in responses to written discovery, but particularly while discovery is ongoing and in advance of
4 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further
5 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly
6 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other
7 discovery propounded in this case, and is therefore in violation of the Special Master's Order
8 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,
9 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular
10 action to a specific Philips entity when all of the Philips entities named as defendants were owned
11 and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also
12 objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal
13 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at
14 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699
15 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.
16 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly
17 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance
18 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request
19 calls for expert testimony. Sharp also objects to the extent that this request calls for information
20 that is covered by attorney-client privilege or the work product protection. Sharp further states
21 that it has not completed its discovery and preparation in this matter and that its investigation of
22 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this
23 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

24 Subject to and without waiving the foregoing objections, Sharp states that the response to
25 this Interrogatory may include the transactional data and documents produced by defendants, co-
26 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
27 responsive to this Interrogatory from review of the documents and data identified in this response
28 is substantially the same for either Sharp or KPNV. Sharp further states that information

responsive to this Interrogatory is contained in the following, which are incorporated here by reference:

- Exhibit A to these Responses;
- Attachment A to these Responses;
- the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying materials;
- the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying materials;
- the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and accompanying materials;
- Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- Korean Fair Trade Commission Report on the CRT Conspiracy;
- The European Commission Report on the CRT Conspiracy;
- Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, No. 5 (February 10, 2012);
- Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12, 2013);
- Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- Koninklijke Philips Electronics N.V. and Philips Electronics North America Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (July 18, 2012);

- 1 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 2 of Interrogatories (July 10, 2014);
- 3 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 4 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 5 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 6 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 7 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 8 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 9 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 10 Interrogatories (November 2, 2011);
- 11 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 12 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 13 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 14 Interrogatories (December 23, 2011);
- 15 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 16 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 17 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 18 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 19 • Philips Electronics North America Corporation's Responses to Direct Action
- 20 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 21 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 22 Interrogatories (May 12, 2010);
- 23 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 24 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 25 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 26 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 27 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 28 (November 25, 2013);

- 1 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
2 Admission (November 25, 2013);
- 3 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
4 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
5 Interrogatories (February 10, 2012);
- 6 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
7 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 8 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
9 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 10 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
11 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
12 those Responses (July 28, 2014);
- 13 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
14 Interrogatories to Sharp (August 4, 2014);
- 15 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
16 2014);
- 17 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
18 Interrogatories to Sharp (August 4, 2014);
- 19 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
20 4, 2014); and
- 21 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
22 (August 4, 2014).

Request No. 12:

24 Separately Identify each meeting or communication with a competitor or competitors,
25 including the Royal Philips employee(s) associated with each meeting or communication, in
26 which you contend Royal Philips participated between 1996 and 2007, as alleged in paragraph
27 194 of the Complaint.

Response to Request No. 12:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendant, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory improperly requires Sharp to marshal all evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case, and is therefore in violation of the Special Master's Order Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3, 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to a specific Philips entity when all of the Philips entities named as defendants were owned and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir. 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request calls for expert testimony. Sharp also objects to the extent that this request calls for information that is covered by attorney-client privilege or the work product protection. Sharp further states that it has not completed its discovery and preparation in this matter and that its investigation of

1 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this
2 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

3 Subject to and without waiving the foregoing objections, Sharp states that the response to
4 this Interrogatory may include the transactional data and documents produced by defendants, co-
5 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
6 responsive to this Interrogatory from review of the documents and data identified in this response
7 is substantially the same for either Sharp or KPNV. Sharp further states that information
8 responsive to this Interrogatory is contained in the following, which are incorporated here by
9 reference:

- 10 • Exhibit A to these Responses;
- 11 • Attachment A to these Responses;
- 12 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
13 materials;
- 14 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
15 materials;
- 16 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
17 accompanying materials;
- 18 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 19 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 20 • The European Commission Report on the CRT Conspiracy;
- 21 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
22 Set of Interrogatories, No. 5 (February 10, 2012);
- 23 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
24 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
25 2013);
- 26 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
27 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 28

- 1 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
2 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 3 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
4 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 5 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
6 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
7 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 8 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
9 of Interrogatories (July 10, 2014);
- 10 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
11 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 12 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
13 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 14 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
15 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
16 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
17 Interrogatories (November 2, 2011);
- 18 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
19 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
20 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
21 Interrogatories (December 23, 2011);
- 22 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
23 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 24 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
25 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 26 • Philips Electronics North America Corporation's Responses to Direct Action
27 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 28

- 1 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 2 Interrogatories (May 12, 2010);
- 3 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 4 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 5 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 6 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 7 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 8 (November 25, 2013);
- 9 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 10 Admission (November 25, 2013);
- 11 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 12 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 13 Interrogatories (February 10, 2012);
- 14 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 15 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 16 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 17 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 18 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 19 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 20 those Responses (July 28, 2014);
- 21 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 22 Interrogatories to Sharp (August 4, 2014);
- 23 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 24 2014);
- 25 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 26 Interrogatories to Sharp (August 4, 2014);
- 27 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 28 4, 2014); and

- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
(August 4, 2014).

Request No. 13:

Separately Identify each meeting or communication with a competitor or competitors, including the Philips America employee(s) associated with each meeting or communication, in which you contend Philips America participated between 1996 and 2007, as alleged in paragraph 194 of the Complaint.

Response to Request No. 13:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendant, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendant. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory improperly requires Sharp to marshal all evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other discovery propounded in this case, and is therefore in violation of the Special Master's Order Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3, 2010). Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to a specific Philips entity when all of the Philips entities named as defendants were owned and controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also objects to this Interrogatory on the grounds that it seeks, in contravention to well-established legal principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.

1 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly
2 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance
3 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request
4 calls for expert testimony. Sharp also objects to the extent that this request calls for information
5 that is covered by attorney-client privilege or the work product protection. Sharp further states
6 that it has not completed its discovery and preparation in this matter and that its investigation of
7 the case is ongoing, and Sharp reserves its right to supplement or amend its response to this
8 Interrogatory consistent with Federal Rule of Civil Procedure 26(e).

9 Subject to and without waiving the foregoing objections, Sharp states that the response to
10 this Interrogatory may include the transactional data and documents produced by defendants, co-
11 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
12 responsive to this Interrogatory from review of the documents and data identified in this response
13 is substantially the same for either Sharp or KPNV. Sharp further states that information
14 responsive to this Interrogatory is contained in the following, which are incorporated here by
15 reference:

- 16 • Exhibit A to these Responses;
- 17 • Attachment A to these Responses;
- 18 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
19 materials;
- 20 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
21 materials;
- 22 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
23 accompanying materials;
- 24 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 25 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 26 • The European Commission Report on the CRT Conspiracy;
- 27 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
28 Set of Interrogatories, No. 5 (February 10, 2012);

- 1 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
- 2 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
- 3 2013);
- 4 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
- 5 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 6 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
- 7 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 8 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 9 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 10 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 11 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 12 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 13 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 14 of Interrogatories (July 10, 2014);
- 15 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 16 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 17 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 18 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 19 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 20 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 21 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 22 Interrogatories (November 2, 2011);
- 23 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 24 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 25 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 26 Interrogatories (December 23, 2011);
- 27 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 28 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);

- 1 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 2 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 3 • Philips Electronics North America Corporation's Responses to Direct Action
- 4 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 5 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 6 Interrogatories (May 12, 2010);
- 7 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 8 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 9 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 10 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 11 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 12 (November 25, 2013);
- 13 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 14 Admission (November 25, 2013);
- 15 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 16 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 17 Interrogatories (February 10, 2012);
- 18 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 19 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 20 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 21 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 22 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 23 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 24 those Responses (July 28, 2014);
- 25 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 26 Interrogatories to Sharp (August 4, 2014);
- 27 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 28 2014);

- 1 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 2 Interrogatories to Sharp (August 4, 2014);
- 3 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 4 4, 2014); and
- 5 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
- 6 (August 4, 2014).

7 **Request No. 14:**

8 Separately for each meeting or competitor communication that You Identified in response
9 to Interrogatory Nos. 12 and 13, Identify All evidence upon which You intend to rely to prove
10 that such a meeting or competitor communication resulted in an agreement to establish "target
11 prices, 'bottom' prices, prices ranges, and price guidelines" for CRTs, as alleged in paragraph
12 176(i) of the Complaint, including:

- 11 a) All Persons with knowledge suggesting that an agreement to fix target prices, floor
- 12 prices and prices ranges for CRTs was reached;
- 13 b) The date of each meeting or competitor communication which You contend
- 14 resulted in an agreement to fix target prices, floor prices and prices ranges for
- 15 CRTs;
- 16 c) The location of each alleged meeting, if applicable;
- 17 d) The entities that you contend agreed to the target price, floor price or price range;
- 18 e) The names of the individuals that You contend participated in each meeting or
- 19 competitor communication;
- 20 f) The date of the agreement;
- 21 g) The type (i.e., CDT or CPT) and model (flat, curved, ITC, bare) of CRT to which
- 22 the target price, floor price or price range applied;
- 23 h) The effective date(s) of the target price, floor price or price range;
- 24 i) The customer(s) to whom the target price, floor price or price range applied;
- 25 j) The geographic area to which the target price, floor price or price range applied;
- 26 and
- 27 k) All evidence upon which You intend to rely to prove such target price, floor price
- 28 or price range (including the Bates number of each Document and/or citation to
specific deposition testimony that You claim supports Your contention).

26 **Response to Request No. 14:**

27 Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp
28 also objects to this Interrogatory to the extent that it calls for information that is already in the

1 possession, custody, or control of Defendants, or that can equally or more readily, conveniently,
2 and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this
3 Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on
4 Sharp to state its entire case on an incomplete record and review and analyze all information
5 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory
6 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,
7 in responses to written discovery, but particularly while discovery is ongoing and in advance of
8 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further
9 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly
10 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other
11 discovery propounded in this case, and is therefore in violation of the Special Master's Order
12 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,
13 2010). Sharp objects to the Interrogatory on the grounds that it violates the Special Master's
14 Report and Recommendation on the Defendants' Motion to Compel, dated August 18, 2014.
15 Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to
16 a specific Philips entity when all of the Philips entities named as defendants were owned and
17 controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also objects to
18 this Interrogatory on the grounds that it seeks, in contravention to well-established legal
19 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at
20 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699
21 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.
22 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly
23 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance
24 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request
25 calls for expert testimony. Sharp also objects to the extent that this request calls for information
26 that is covered by attorney-client privilege or the work product protection. Sharp also objects that
27 this is a compound interrogatory consisting of eleven distinct subparts, each of which is a separate
28 interrogatory, and therefore is overbroad and unduly burdensome. Sharp further states that it has

1 not completed its discovery and preparation in this matter and that its investigation of the case is
2 ongoing, and Sharp reserves its right to supplement or amend its response to this Request
3 consistent with Federal Rule of Civil Procedure 26(e).

4 Subject to and without waiving the foregoing objections, Sharp states that the response to
5 this Interrogatory may include the transactional data and documents produced by defendants, co-
6 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
7 responsive to this Interrogatory from review of the documents and data identified in this response
8 is substantially the same for either Sharp or KPNV. Sharp further states that information
9 responsive to this Interrogatory is contained in the following, which are incorporated here by
10 reference:

- 11 • Exhibit A to these Responses;
- 12 • Attachment A to these Responses;
- 13 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
14 materials;
- 15 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
16 materials;
- 17 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
18 accompanying materials;
- 19 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 20 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 21 • The European Commission Report on the CRT Conspiracy;
- 22 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
23 Set of Interrogatories, No. 5 (February 10, 2012);
- 24 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
25 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
26 2013);
- 27 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
28 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);

- 1 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
2 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 3 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
4 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 5 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
6 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
7 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 8 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
9 of Interrogatories (July 10, 2014);
- 10 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
11 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 12 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
13 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 14 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
15 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
16 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
17 Interrogatories (November 2, 2011);
- 18 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
19 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
20 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
21 Interrogatories (December 23, 2011);
- 22 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
23 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 24 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
25 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 26 • Philips Electronics North America Corporation's Responses to Direct Action
27 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 28

- 1 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 2 Interrogatories (May 12, 2010);
- 3 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 4 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 5 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 6 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 7 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 8 (November 25, 2013);
- 9 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
- 10 Admission (November 25, 2013);
- 11 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
- 12 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
- 13 Interrogatories (February 10, 2012);
- 14 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
- 15 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 16 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
- 17 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 18 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
- 19 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
- 20 those Responses (July 28, 2014);
- 21 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
- 22 Interrogatories to Sharp (August 4, 2014);
- 23 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
- 24 2014);
- 25 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
- 26 Interrogatories to Sharp (August 4, 2014);
- 27 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
- 28 4, 2014); and

- Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
(August 4, 2014).

Request No. 15:

Separately for each meeting or competitor communication that You Identified in response to Interrogatory Nos. 12 and 13, Identify all Evidence upon which You intend to rely to prove that such a meeting or competitor communication resulted in an agreement to maintain or lower production capacity for CRTs, as alleged in paragraph 253(g) of the Complaint, including:

- All persons with knowledge suggesting that an agreement to maintain or lower production capacity for CRTs was reached;
- The date of each meeting or competitor communication which You contend resulted in an agreement to maintain or lower production capacity for CRTs;
- The location of each alleged meeting, if applicable;
- The entities who you contend agreed to maintain or lower production capacity for CRTs;
- The names of the individuals that You contend participated in each meeting or competitor communication;
- The date of the agreement;
- The type (i.e., CDT or CPT) and model (flat, curved, ITC, bare) of CRT to which the agreement applied;
- The effective date(s) of the agreement to maintain or lower production capacity for CRTs;
- The geographic area to which the agreement to maintain or lower production capacity for CRTs applied; and
- All evidence upon which You intend to rely to prove that an agreement to maintain or lower production capacity for CRTs was reached (including the Bates number of each Document and/or citation to specific deposition testimony that You claim supports Your contention).

Response to Request No. 15:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information

1 obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory
2 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,
3 in responses to written discovery, but particularly while discovery is ongoing and in advance of
4 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further
5 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly
6 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other
7 discovery propounded in this case, and is therefore in violation of the Special Master's Order
8 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,
9 2010). Sharp objects to the Interrogatory on the grounds that it violates the Special Master's
10 Report and Recommendation on the Defendants' Motion to Compel, dated August 18, 2014.
11 Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to
12 a specific Philips entity when all of the Philips entities named as defendants were owned and
13 controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also objects to
14 this Interrogatory on the grounds that it seeks, in contravention to well-established legal
15 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at
16 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699
17 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.
18 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly
19 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance
20 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request
21 calls for expert testimony. Sharp also objects to the extent that this request calls for information
22 that is covered by attorney-client privilege or the work product protection. Sharp also objects that
23 this is a compound interrogatory consisting of ten distinct subparts, each of which is a separate
24 interrogatory, and therefore is overbroad and unduly burdensome. Sharp further states that it has
25 not completed its discovery and preparation in this matter and that its investigation of the case is
26 ongoing, and Sharp reserves its right to supplement or amend its response to this Request
27 consistent with Federal Rule of Civil Procedure 26(e).
28

1 Subject to and without waiving the foregoing objections, Sharp states that the response to
2 this Interrogatory may include the transactional data and documents produced by defendants, co-
3 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
4 responsive to this Interrogatory from review of the documents and data identified in this response
5 is substantially the same for either Sharp or KPNV. Sharp further states that information
6 responsive to this Interrogatory is contained in the following, which are incorporated here by
7 reference:

- 8 • Exhibit A to these Responses;
- 9 • Attachment A to these Responses;
- 10 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
11 materials;
- 12 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
13 materials;
- 14 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
15 accompanying materials;
- 16 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 17 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 18 • The European Commission Report on the CRT Conspiracy;
- 19 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
20 Set of Interrogatories, No. 5 (February 10, 2012);
- 21 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
22 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
23 2013);
- 24 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
25 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 26 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
27 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 28

- 1 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
2 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 3 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
4 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
5 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 6 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
7 of Interrogatories (July 10, 2014);
- 8 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
9 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 10 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
11 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 12 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
13 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
14 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
15 Interrogatories (November 2, 2011);
- 16 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
17 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
18 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
19 Interrogatories (December 23, 2011);
- 20 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
21 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 22 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
23 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 24 • Philips Electronics North America Corporation's Responses to Direct Action
25 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 26 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
27 Interrogatories (May 12, 2010);
- 28

- 1 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
2 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 3 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
4 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 5 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
6 (November 25, 2013);
- 7 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
8 Admission (November 25, 2013);
- 9 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
10 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
11 Interrogatories (February 10, 2012);
- 12 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
13 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 14 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
15 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 16 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
17 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
18 those Responses (July 28, 2014);
- 19 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
20 Interrogatories to Sharp (August 4, 2014);
- 21 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
22 2014);
- 23 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
24 Interrogatories to Sharp (August 4, 2014);
- 25 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
26 4, 2014); and
- 27 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
28 (August 4, 2014).

Request No. 16:

Separately for each meeting or competitor communication that You Identified in response to Interrogatory Nos. 12 and 13, Identify all Evidence upon which You intend to rely to prove that such a meeting or competitor communication resulted in an agreement to allocate either overall market shares or share of a particular customer's purchases, as alleged in paragraph 176(viii) of the Complaint, including:

- a) All persons with knowledge suggesting that an agreement to allocate either overall market share or share of a particular customer's purchases;
- b) The date of each meeting or competitor communication which You contend resulted in an agreement to allocate either overall market share or share of a particular customer's purchases;
- c) The location of each alleged meeting, if applicable;
- d) The entities who you contend agreed to allocate either overall market share or share of a particular customer's purchases;
- e) The names of the individuals that You contend participated in each meeting or competitor communication;
- f) The date of the agreement;
- g) The type (i.e., CDT or CPT) and model (flat, curved, ITC, bare) of CRT to which the agreement applied;
- h) The effective date(s) of the agreement to allocate either overall market share or share of a particular customer's purchases;
- i) The geographic area to which the agreement to allocate either overall market share or share of a particular customer's purchases; and
- j) All evidence upon which You intend to rely to prove that an agreement to allocate either overall market share or share of a particular customer's purchases was reached (including the Bates number of each Document and/or citation to specific deposition testimony that You claim supports Your contention).

Response to Request No. 16:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory

1 improperly requires Sharp to marshal all evidence in support of its case, including all testimony,
2 in responses to written discovery, but particularly while discovery is ongoing and in advance of
3 the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further
4 objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly
5 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other
6 discovery propounded in this case, and is therefore in violation of the Special Master's Order
7 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,
8 2010). Sharp objects to the Interrogatory on the grounds that it violates the Special Master's
9 Report and Recommendation on the Defendants' Motion to Compel, dated August 18, 2014.
10 Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to
11 a specific Philips entity when all of the Philips entities named as defendants were owned and
12 controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also objects to
13 this Interrogatory on the grounds that it seeks, in contravention to well-established legal
14 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at
15 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699
16 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.
17 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly
18 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance
19 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request
20 calls for expert testimony. Sharp also objects to the extent that this request calls for information
21 that is covered by attorney-client privilege or the work product protection. Sharp also objects that
22 this is a compound interrogatory consisting of ten distinct subparts, each of which is a separate
23 interrogatory, and therefore is overbroad and unduly burdensome. Sharp further states that it has
24 not completed its discovery and preparation in this matter and that its investigation of the case is
25 ongoing, and Sharp reserves its right to supplement or amend its response to this Request
26 consistent with Federal Rule of Civil Procedure 26(e).

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1 Subject to and without waiving the foregoing objections, Sharp states that the response to
2 this Interrogatory may include the transactional data and documents produced by defendants, co-
3 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
4 responsive to this Interrogatory from review of the documents and data identified in this response
5 is substantially the same for either Sharp or KPNV. Sharp further states that information
6 responsive to this Interrogatory is contained in the following, which are incorporated here by
7 reference:

- 8 • Exhibit A to these Responses;
- 9 • Attachment A to these Responses;
- 10 • the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying
11 materials;
- 12 • the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying
13 materials;
- 14 • the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and
15 accompanying materials;
- 16 • Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- 17 • Korean Fair Trade Commission Report on the CRT Conspiracy;
- 18 • The European Commission Report on the CRT Conspiracy;
- 19 • Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First
20 Set of Interrogatories, No. 5 (February 10, 2012);
- 21 • Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to
22 Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12,
23 2013);
- 24 • Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser
25 Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- 26 • Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct
27 Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- 28

- 1 • Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser
- 2 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- 3 • Koninklijke Philips Electronics N.V. and Philips Electronics North America
- 4 Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 5 Interrogatories Nos. 4 and 5 (July 18, 2012);
- 6 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 7 of Interrogatories (July 10, 2014);
- 8 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 9 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 10 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 11 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 12 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 13 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 14 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 15 Interrogatories (November 2, 2011);
- 16 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 17 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 18 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 19 Interrogatories (December 23, 2011);
- 20 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 21 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 22 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 23 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 24 • Philips Electronics North America Corporation's Responses to Direct Action
- 25 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 26 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 27 Interrogatories (May 12, 2010);
- 28

- 1 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
2 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 3 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
4 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 5 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
6 (November 25, 2013);
- 7 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
8 Admission (November 25, 2013);
- 9 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
10 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
11 Interrogatories (February 10, 2012);
- 12 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
13 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 14 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
15 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 16 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
17 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
18 those Responses (July 28, 2014);
- 19 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
20 Interrogatories to Sharp (August 4, 2014);
- 21 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
22 2014);
- 23 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
24 Interrogatories to Sharp (August 4, 2014);
- 25 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
26 4, 2014); and
- 27 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
28 (August 4, 2014).

Request No. 17:

Separately for each meeting or competitor communication that You Identified in response to Interrogatory Nos. 12 and 13, Identify all Evidence upon which You intend to rely to prove that such a meeting or competitor communication resulted in an agreement to allocate customers, as alleged in paragraph 176(ix) of the Complaint, including:

- a) All persons with knowledge suggesting that an agreement to allocate customers;
- b) The date of each meeting or competitor communication which You contend resulted in an agreement to allocate customers;
- c) The location of each alleged meeting, if applicable;
- d) The entities who you contend agreed to allocate customers;
- e) The names of the individuals that You contend participated in each meeting or competitor communication;
- f) The date of the agreement;
- g) The type (i.e., CDT or CPT) and model (flat, curved, ITC, bare) of CRT to which the agreement applied;
- h) The effective date(s) of the agreement to allocate customers;
- i) The geographic area to which the agreement to allocate customers; and
- j) All evidence upon which You intend to rely to prove that an agreement to allocate customers was reached (including the Bates number of each Document and/or citation to specific deposition testimony that You claim supports Your contention).

Response to Request No. 17:

Sharp refers to and incorporates its General Objections as if set forth fully herein. Sharp also objects to this Interrogatory to the extent that it calls for information that is already in the possession, custody, or control of Defendants, or that can equally or more readily, conveniently, and in a less burdensome fashion be obtained by Defendants. Sharp further objects to this Interrogatory on the grounds that it is premature, and that it seeks to impose an undue burden on Sharp to state its entire case on an incomplete record and review and analyze all information obtained in discovery thus far at this stage of this litigation. Sharp objects that this Interrogatory improperly requires Sharp to marshal all evidence in support of its case, including all testimony, in responses to written discovery, but particularly while discovery is ongoing and in advance of the applicable deadlines set by the Court for disclosure of pretrial information. Sharp further objects to the Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly

1 burdensome, and oppressive, and on the grounds that it is cumulative and duplicative of other
2 discovery propounded in this case, and is therefore in violation of the Special Master's Order
3 Regarding Individual Action Plaintiffs and Case Management (MDL Dkt. No. 1727, May 3,
4 2010). Sharp objects to the Interrogatory on the grounds that it violates the Special Master's
5 Report and Recommendation on the Defendants' Motion to Compel, dated August 18, 2014.
6 Sharp additionally objects to the Interrogatory as requiring the attribution of a particular action to
7 a specific Philips entity when all of the Philips entities named as defendants were owned and
8 controlled and acted pursuant to the overall strategy and direction of KPNV. Sharp also objects to
9 this Interrogatory on the grounds that it seeks, in contravention to well-established legal
10 principles, to dismember the overall conspiracy to focus on its separate parts, instead of looking at
11 it as a whole. *See Continental Ore Co. v. Union Carbide & Carbon Corp.*, 370 U.S. 690, 699
12 (1962); *Beltz Travel Service, Inc. v. Int'l Air Trans. Assoc.*, 620 F.2d 1360, 1366-67 (9th Cir.
13 1980) (citing *United States v. Patten*, 226 U.S. 525, 544 (1913)). All conspirators are jointly
14 liable for the acts of their co-conspirators and the action of any of the conspirators in furtherance
15 of the conspiracy is, in law, the action of all. *Id.* Sharp further objects to the extent this request
16 calls for expert testimony. Sharp also objects to the extent that this request calls for information
17 that is covered by attorney-client privilege or the work product protection. Sharp also objects that
18 this is a compound interrogatory consisting of ten distinct subparts, each of which is a separate
19 interrogatory, and therefore is overbroad and unduly burdensome. Sharp further states that it has
20 not completed its discovery and preparation in this matter and that its investigation of the case is
21 ongoing, and Sharp reserves its right to supplement or amend its response to this Request
22 consistent with Federal Rule of Civil Procedure 26(e).

23 Subject to and without waiving the foregoing objections, Sharp states that the response to
24 this Interrogatory may include the transactional data and documents produced by defendants, co-
25 conspirators, and third parties in MDL No. 1917. The burden of identifying specific documents
26 responsive to this Interrogatory from review of the documents and data identified in this response
27 is substantially the same for either Sharp or KPNV. Sharp further states that information
28

responsive to this Interrogatory is contained in the following, which are incorporated here by reference:

- Exhibit A to these Responses;
- Attachment A to these Responses;
- the expert report of Dr. Michael D. Whinston dated August 5, 2014 and accompanying materials;
- the expert report of Dr. Jerry A. Hausman dated April 15, 2014 and accompanying materials;
- the supplemental report of Dr. Jerry A. Hausman dated July 3, 2014 and accompanying materials;
- Demonstrative Exhibit 1 to the expert report of Jerry A. Hausman dated July 15, 2014;
- Korean Fair Trade Commission Report on the CRT Conspiracy;
- The European Commission Report on the CRT Conspiracy;
- Hitachi Displays, Ltd.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, No. 5 (February 10, 2012);
- Hitachi Displays, Ltd.'s (n/k/a Japan Display Inc.) Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 12, 2013);
- Hitachi Electronic Devices (USA), Inc.'s Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (February 10, 2012);
- Hitachi Electronic Devices (USA), Inc.'s Second Supplemental Response to Direct Purchaser Plaintiffs' First Set of Interrogatories, Interrogatory No. 5 (April 26, 2013);
- Koninklijke Philips Electronics N.V.'s Responses and Objections to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (March 21, 2012);
- Koninklijke Philips Electronics N.V. and Philips Electronics North America Corporation Responses and Objections to Direct Purchaser Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (July 18, 2012);

- 1 • Koninklijke Philips Electronics N.V.'s Responses to Direct Action Plaintiffs' First Set
- 2 of Interrogatories (July 10, 2014);
- 3 • LG Electronics, Inc.'s Supplemental Responses to Direct Purchaser Plaintiffs' First
- 4 Set of Interrogatories, Interrogatories Nos. 4 and 5 (Feb. 10, 2012);
- 5 • LG Electronics, Inc.'s Second Supplemental Responses to Direct Purchaser Plaintiffs'
- 6 First Set of Interrogatories, Interrogatories Nos. 4 and 5;
- 7 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 8 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Second
- 9 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 10 Interrogatories (November 2, 2011);
- 11 • Panasonic Corporation of North America, MT Picture Display Co., Ltd., and
- 12 Panasonic Corporation's (f/k/a Matsushita Electric Industrial Co., Ltd.) Third
- 13 Supplemental Responses and Objections to Direct Purchaser Plaintiffs' First Set of
- 14 Interrogatories (December 23, 2011);
- 15 • Philips' Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 16 Interrogatories, Interrogatories Nos. 4 and 5 (March 21, 2012);
- 17 • Philips' Second Supplemental Responses to Direct Purchaser Plaintiffs' First Set of
- 18 Interrogatories, Interrogatories Nos. 4 and 5 (July 18, 2012);
- 19 • Philips Electronics North America Corporation's Responses to Direct Action
- 20 Plaintiffs' First Set of Interrogatories (July 10, 2014);
- 21 • Samsung SDI Defendants' Responses to Direct Action Plaintiffs' First Set of
- 22 Interrogatories (May 12, 2010);
- 23 • Samsung SDI Defendants' Supplemental Responses to Direct Purchaser Plaintiffs'
- 24 First Set of Interrogatories Nos. 4 and 5 (October 17, 2011);
- 25 • Samsung SDI Defendants' Second Supplemental Responses to Direct Purchaser
- 26 Plaintiffs' First Set of Interrogatories Nos. 4 and 5 (November 25, 2013);
- 27 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Interrogatories
- 28 (November 25, 2013);

- 1 • Samsung SDI Co., Ltd.'s Responses to Dell Plaintiffs' First Set of Requests for
2 Admission (November 25, 2013);
- 3 • Toshiba America Electronic Components, Inc.'s Supplemental Objections and
4 Responses to Interrogatory Nos. 4 and 5 of Direct Purchaser Plaintiffs' First Set of
5 Interrogatories (February 10, 2012);
- 6 • Toshiba Corporation's Supplemental Objections and Responses to Interrogatory Nos.
7 4 and 5 of Direct Purchaser Plaintiffs' First Set of Interrogatories (February 10, 2012);
- 8 • Sharp's Responses to Thomson SA and Thomson Consumer's First Set of
9 Interrogatories, Nos. 2 & 8 (July 10, 2014);
- 10 • Sharp's Objections and Responses to MT Picture Display Co., Ltd. and LG
11 Electronics USA, Inc.'s Second Set of Interrogatories, Nos. 16 & 17 and Exhibit A to
12 those Responses (July 28, 2014);
- 13 • Sharp's Response to Hitachi Electronic Devices (USA), Inc.'s Second Set of
14 Interrogatories to Sharp (August 4, 2014);
- 15 • Sharp's Response to Hitachi, Ltd.'s First Set of Interrogatories to Sharp (August 4,
16 2014);
- 17 • Sharp's Response to Hitachi Displays, Ltd.'s (N/K/A Japan Display Inc.) First Set of
18 Interrogatories to Sharp (August 4, 2014);
- 19 • Sharp's Response to Hitachi Asia, Ltd.'s First Set of Interrogatories to Sharp (August
20 4, 2014); and
- 21 • Sharp's Response to Hitachi America, Ltd.'s First Set of Interrogatories to Sharp
22 (August 4, 2014).